

1 MICHAEL A. JACOBS (CA SBN 111664)  
2 MJacobs@mofo.com  
3 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
4 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
5 RUDY Y. KIM (CA SBN 199426)  
RKKim@mofo.com  
6 MORRISON & FOERSTER LLP  
425 Market Street  
7 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsfllp.com  
9 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsfllp.com  
10 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
11 Washington DC 20005  
Telephone: 202.237.2727  
12 Facsimile: 202.237.6131

13 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

19 Plaintiff,

20 v.

21 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,

22 Defendants.

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
THEIR MOTION TO STRIKE  
VAGUE AND OVERBROAD TRADE  
SECRET CLAIMS AND  
EMERGENCY MOTION FOR  
EXPEDITED BRIEFING AND  
HEARING AND EXHIBITS  
THERETO**

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1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and  
 2 Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their  
 3 Motion to Strike Vague and Overbroad Trade Secret Claims and Emergency Motion for  
 4 Expedited Briefing and Hearing and Exhibits Thereto. Specifically, Defendants request an order  
 5 granting leave to file under seal the confidential portions of the following documents:

6 <b>Document</b>	7 <b>Portions to Be Filed Under Seal</b>	8 <b>Designating Party</b>
9 Motion to Strike Vague and 10 Overbroad Trade Secret 11 Claims and Emergency 12 Motion for Expedited 13 Briefing and Hearing 14 (“Motion”)	15 Highlighted Portions	16 Plaintiff (green)
17 Declaration of Esther 18 Chang	19 Highlighted Portions	20 Plaintiff (green)
21 Exhibits 2-7 and 14-16 to 22 the Declaration of Esther 23 Chang	24 Entire Documents	25 Plaintiff
26 Exhibits 12-13 to the 27 Declaration of Esther 28 Chang	29 Highlighted Portions	30 Plaintiff (green)
31 Exhibit 1 to the Declaration 32 of Rudy Kim	33 Entire Document	34 Plaintiff

35 The green-highlighted portions of the Motion, the green-highlighted portions of the  
 36 Declaration of Esther Chang, and the green-highlighted portions of Exhibits 12-13 to the Chang  
 37 Declaration, as well as the entireties of Exhibits 2-7 and 14-16 to the Chang Declaration and the  
 38 entirety of Exhibit 1 to the Declaration of Rudy Kim, contain information that has been  
 39 designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the  
 40 Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties  
 41 have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this  
 42 material under seal in accordance with Paragraph 14.4 of the Protective Order. (Declaration of  
 43

1 Michelle Yang in Support of Defendants' Administrative Motion to File Documents Under Seal  
2 ("Yang Decl.") ¶ 3.)

3 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
4 documents at issue, with accompanying chamber copies.

5 Defendants served Waymo with this Administrative Motion to File Documents Under  
6 Seal on August 7, 2017.

7 For the foregoing reasons, Defendants request that the Court enter the accompanying  
8 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and  
9 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –  
10 ATTORNEYS' EYES ONLY."

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12 Dated: August 7, 2017

MORRISON & FOERSTER LLP

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By: /s/Arturo J. González  
ARTURO J. GONZALEZ

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Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC, and OTTO  
TRUCKING LLC

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